

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NORTH CAROLINA  
WESTERN DIVISION  
CASE NO. 5:21-cv-0137-FL

360 VIRTUAL DRONE SERVICES )  
LLC and MICHAEL JONES, )  
 )  
Plaintiffs, )  
 )  
v. )  
 )  
ANDREW L. RITTER, in his official )  
capacity as Executive Director of the )  
North Carolina Board of Examiners for )  
Engineers and Surveyors; and JOHN )  
M. LOGSDON, JONATHAN S. CARE, )  
DENNIS K. HOYLE, RICHARD M. )  
BENTON, CARL M. ELLINGTON, JR, )  
CEDRIC D. FAIRBANKS, BRENDA L. )  
MOORE, CAROL SALLOUM, and )  
ANDREW G. ZOUTWELLE, in their )  
official capacities as members of the )  
North Carolina Board of Examiners for )  
Engineers and Surveyors, )  
 )  
Defendants. )

**DEFENDANTS' APPENDIX TO  
LOCAL RULE 56.1 STATEMENT  
OF MATERIAL FACTS**

Defendants, through counsel and pursuant to Local Rule 56.1, respectfully submits the following Appendix to their Statement of Material Facts:

- Exhibit 1     Andrew Ritter Affidavit
- Exhibit 2     Rule 30(b)(6) Deposition Transcript of Plaintiff 360 Virtual Drone Services, LLC
- Exhibit 3     Deposition Transcript of Plaintiff Michael Jones
- Exhibit 4     Plaintiff's Response to Request for Admissions
- Exhibit 5     Rule 30(b)(6) Deposition Transcript of the North Carolina Board of Examiners and Surveyors

Exhibit 6 Defendants' Disclosure of Expert Testimony

Exhibit 7 Deposition Transcript of Alex Abate

Respectfully submitted this the 25<sup>th</sup> day of March, 2022.

FITZGERALD HANNA & SULLIVAN, PLLC

/s/ Douglas W. Hanna

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*Attorneys for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that I have this day filed the foregoing **DEFENDANTS' APPENDIX TO LOCAL RULE 56.1 STATEMENT OF MATERIAL FACTS** with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

David G. Guidry, Mainsail Lawyers, [dguidry@mainsaillawyers.com](mailto:dguidry@mainsaillawyers.com)

Samuel B. Gedge, Institute for Justice, [sgedge@ij.org](mailto:sgedge@ij.org)

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This the 25<sup>th</sup> day of March, 2022.

/s/ Douglas W. Hanna

Douglas W. Hanna, NCSB #18225